

EXHIBIT 1

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9 Attorneys for Plaintiffs Carlos
Victorino and Adam Tavitian

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

CARLOS VICTORINO and ADAM TAVITIAN, individually, and on behalf of other members of the general public similarly situated,

16 | Plaintiffs.

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18 FCA US LLC, a Delaware limited
liability company,

Defendant.

Case No.: '16CV1617 GPC JLB

DECLARATION OF CARLOS VICTORINO IN SUPPORT OF VENUE FOR CLASS ACTION COMPLAINT PURSUANT TO CIVIL CODE SECTION 1780(d)

DECLARATION OF CARLOS VICTORINO

I, Carlos Victorino, declare under penalty of perjury as follows:

1. I make this declaration based upon my personal knowledge except as to those matters stated herein that are based upon information and belief, and as to those matters I believe them to be true. I am over the age of eighteen, a citizen of the State of California, and a Plaintiff in this action.

2. Pursuant to California Civil Code section 1780(d), this Declaration is submitted in support of Plaintiff's Selection of Venue for the Trial of Plaintiffs' Cause of Action alleging violation of California's Consumers Legal Remedies Act.

3. I reside in Chula Vista, California, which is in the County of San Diego. I keep my vehicle, which is the subject of this lawsuit, at my home in Chula Vista. I also service my vehicle in the County of San Diego.

4. I am informed and believe that Defendant FCA US LLC (“Defendant”) is a Delaware limited liability company, organized and existing under the laws of the State of Delaware, and registered to conduct business in California. Defendant FCA US LLC’s Corporate Headquarters are located at 1000 Chrysler Drive, Auburn Hills, Michigan 48326. On information and belief, Defendant conducts business in San Diego County, including marketing, distributing, selling, and servicing vehicles through its authorized dealerships.

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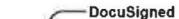
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1 5. Based on the facts set forth herein, this Court is a proper venue for
2 the prosecution of Plaintiffs' Cause of Action alleging violation of California's
3 Consumers Legal Remedies Act because vehicles that are the subject of this
4 lawsuit are situated here, and a substantial portion of the events giving rise to my
5 claims occurred here. Further, Defendant conducts business in the Southern
6 District of California and the County of San Diego, California, including, but not
7 limited to, marketing, distributing, selling, and/or servicing Class Vehicles to
8 Class Members.

9 6. I declare under penalty of perjury under the laws of California and
10 the United States of America that the foregoing is true and correct.

11 Executed on June 24, 2016 in Chula Vista, California.

12 DocuSigned by:
13 
14 Carlos Victorino
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Carlos Victorino